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6 Attorneys for Defendant, KEY
INSURANCE COMPANY

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 CAVISHA OM UNIQUE JACKSON,
10 Plaintiff,

11 vs.

12 KEY INSURANCE COMPANY, a foreign
corporation; DOE I through X, inclusive; ROE
13 CORPORATIONS I through X, inclusive,

14 Defendants.

Case No. 2:23-cv-01036

**STIPULATION AND ORDER TO
EXTEND BRIEFING SCHEDULE
(SECOND REQUEST)**

ECF No. 26

15 IT IS HEREBY STIPULATED by and between the undersigned counsel that the time for
16 Defendant, KEY INSURANCE COMPANY, to file its Opposition to Plaintiff's Motion for
17 Summary Judgment be extended to Friday, December 20, 2024. This stipulation is a result of a
18 request by counsel for Defendant.

19 On November 26, 2024, Mr. Goodhart's first grand-daughter (4 months old) underwent a
20 surgical procedure in San Diego, California. Mr. Goodhart sought to be there while the procedure
21 was being performed. Mr. Goodhart anticipated being able to complete the drafting of the
22 Opposition to Plaintiff's Motion for Summary Judgment prior to the agreed upon deadline, but
23 came down with the flu shortly after returning to Las Vegas. Mr. Goodhart's flu symptoms did not
24 resolve until December 3, 2024, prompting his request for the instant extension of time on the
25 briefing schedule. The dates requested were agreed upon by counsel based on Mr. Goodhart's
26 situation, as well as in consideration of the upcoming holidays. This request is not intended to delay
27 this litigation.

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1 IT IS ALSO STIPULATED by and between the undersigned counsel that Plaintiff,
2 CAVISHA OM UNIQUE JACKSON's Reply to Defendant's Opposition to Plaintiffs' Motion for
3 Summary Judgment will be due on Friday, January 10, 2025.

4 DATE: December 10, 2024

5 THE702FIRM

6 /s/ *Thomas N. Beckom*

7 MICHAEL C. KANE ESQ.
Nevada Bar No. 10096
8 BRADLEY J. MYERS, ESQ.
Nevada Bar No. 8857
9 THOMAS N. BECKOM, ESQ.
Nevada Bar No. 12554
10 8335 W. Flamingo Road
Las Vegas, Nevada 89147
11 Attorneys for Plaintiff

DATE: December 10, 2024

THORNDAL ARMSTRONG, PC

/s/ *Philip Goodhart*

PHILIP GOODHART, ESQ.
Nevada Bar No. 5332
600 S. Las Vegas Blvd., Suite 400
Las Vegas, Nevada 89101
Attorneys for Defendant,
KEY INSURANCE COMPANY

12 **ORDER**

13 IT IS HEREBY ORDERED that the time for Defendant to file its Opposition to
14 Plaintiff's Motion for Summary Judgment is extended to Friday, December 20, 2024.

15 IT IS FURTHER ORDERED that Plaintiff, CAVISHA OM UNIQUE JACKSON's Reply
16 to Defendant's Opposition to Plaintiffs' Motion for Summary Judgment is due on Friday, January
17 10, 2025.



18
19 UNITED STATES DISTRICT JUDGE
20
21 12-16-24

22 Submitted by:

23 THORNDAL ARMSTRONG, PC

24 /s/ *Philip Goodhart*

25 PHILIP GOODHART, ESQ.
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600 S. Las Vegas Blvd., Suite 400
26 Las Vegas, Nevada 89101
27 Attorneys for Defendant,
28 KEY INSURANCE COMPANY